

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRANDON MILLER, et al.,)	
)	Case No. 2:18-cv-1341
Plaintiffs,)	
)	Judge Sarah D. Morrisson
v.)	
)	Magistrate Judge Kimberly A. Jolson
CHARTER NEX FILMS - DELAWARE, OH, INC., et al.,)	
)	<u>NOTICE OF SETTLEMENT AND</u>
Defendants.)	<u>REQUEST FOR A FAIRNESS</u>
)	<u>HEARING</u>

Plaintiffs Brandon Miller and Seth Recore, on behalf of themselves and those similarly-situated (“Plaintiffs”) and Defendants Charter NEX Films - Delaware, OH, Inc. and Charter NEX Films, Inc. (collectively, the “Defendants”) through their respective undersigned counsel, jointly file this Notice of Settlement.

1. On January 31, 2020, the parties, after engaging in arms’ length negotiations, were able to successfully resolve Plaintiffs’ claims, on behalf of themselves and others similarly-situated.

2. The parties are working to jointly reduce the settlement to writing, obtain signatures on the settlement agreement, and draft additional documents to obtain Court approval of the settlement agreement.

3. The parties anticipate obtaining the required signatures on the settlement agreement and filing their joint motion for preliminary approval of the settlement and supporting documents for the Court’s approval on or before April 1, 2020.

4. The parties anticipate providing a 60-day notice period, from the date of mailing a notice of collective and class action settlement, for putative class members to exclude themselves from the Rule 23 class or object to the settlement.

5. Accordingly, the parties respectfully request that the Court:
- a. Set a deadline of April 1, 2020 for the parties to file their joint motion for preliminary approval of collective and class action settlement;
 - b. Set a Rule 23 fairness hearing, subject to the Court's availability, seventy-five days following the date of the Court's preliminary approval order, or as soon as possible thereafter, for final approval of the settlement agreement; and
 - c. Stay all other deadlines in this matter while the parties finalize the settlement.

Dated: January 31, 2020.

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